



R05-14-A-058

**Thomas F. Williams**  
**Mayor**

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January 22, 2014

4645 Montgomery Road  
Norwood, Ohio 45212

Environmental Management Support, Inc.  
Attn: Mr. Don West  
8601 Georgia Avenue, Suite 500  
Silver Spring, MD 20910  
Phone: (301) 589-5318

Dear Mr. West:

The City of Norwood is submitting the enclosed application for U.S. EPA Brownfield Assessment Grants to undertake Community-Wide assessment of sites potentially contaminated by petroleum and hazardous substances. The combined grant request is \$400,000. Norwood intends to use the requested funds to support reinvestment of underutilized brownfield sites to create new jobs, increase the tax base, and increase the overall health and safety of our community. The Assessment Grants will also supplement existing redevelopment initiatives and wellness strategies already in place.

The City of Norwood has historically been an industry based economy composed of large-scale manufacturing and local industries. Norwood was home to a large GM plant and compatible suppliers and manufacturers, whose closure resulted in more than 9,000 jobs lost and diminished City revenues by 35%. Norwood is experiencing significant anchor business closures even today. In the last three years the City loss an additional two thousand jobs as six of the City's largest and longest-running businesses announced they were closing or moving to new locations in Cincinnati and Northern Kentucky. This decreased City revenues by another 20%. The vacancy of their plants have also created more than 35 acres of brownfields in the City. As the industrial base declined, the local neighborhoods also declined in population and business investment. Norwood has experienced a steady population decline over the last 40 years, and its current tax revenues and operating budget are at the lowest point since 2005.

Norwood has made progress addressing some of the industrial sites located near Interstate Highway I-71 and Norwood Lateral (ST RT 562) into vibrant new developments. Norwood is ready to continue moving forward by assessing the condition of the remaining industrial properties and redevelop them into viable components of the community. Since the City of Norwood is completely urban and is built-out, these sites are some of the few remaining locations suitable for economic investment and are currently the most underutilized sections of Norwood. Many of these industrial sites are located in areas where lower income populations reside. The industrial sites located in these communities are having an adverse effect on the quality of life within these communities. City of Norwood's objective is to protect these

*"Gem of The Highlands"*

residents from the impact of abandoned properties and potential environmental hazards. Over time Norwood has absorbed the impacts of its brownfields and undertaken renewal projects with diminishing resources, but at this point Norwood's need for this US EPA assessment tool is critical. In an effort to address its challenges, Norwood has partnered with nonprofit organizations, real estate developers, and community leaders to focus on the goal of increasing tax revenues and livability standards through targeted redevelopment. This partnership identified sections of the City that provide opportunities for new business development, new jobs, and new housing. The priorities for use of Brownfield Assessment funds coincide with these areas and are as follows: 1) Montgomery Road and Norwood Lateral Corridor, and 2) scattered sites within Neighborhoods. The following applicant information was requested as part of the Grant Application:

<u>a. Applicant Identification:</u>	City of Norwood 4645 Montgomery Road Norwood, Ohio 45212
<u>b. Applicant DUNS Number:</u>	077433951
<u>c. Funding Requested:</u>	i) Assessment ii) \$200,000 – Hazardous Substances \$200,000 – Petroleum iii) Both iv) Community-Wide
<u>d. Location:</u>	Target Areas within City of Norwood (Hamilton County, Ohio)
<u>e. Site Identification</u>	Not Applicable
<u>f. Contacts:</u>	
i) Project Director: Mr. Gerry Stoker Economic Development Director 4645 Montgomery Road, Norwood, Ohio 45212 Ph: (513) 458-4510 Fax: (513) 458-4510 Email: <a href="mailto:gerry@stoker.org">gerry@stoker.org</a>	ii) Highest Ranking Elected Official: Mayor Thomas Williams 4645 Montgomery Road, Norwood, Ohio 45212 Ph: (513) 458-4501 Fax: (513) 458-4501 Email: <a href="mailto:mayor@norwood-ohio.com">mayor@norwood-ohio.com</a>
<u>g. Date Submitted:</u>	January 22, 2014
<u>h. Project Period:</u>	3 Years
<u>i. Population</u>	i) 19,207 ii) Not Applicable
<u>j. Other Factors Checklist</u>	Attached per Request

Thank you for your time and consideration of this Grant Application.

Sincerely



Thomas F. Williams, Mayor  
City of Norwood

## **1. COMMUNITY NEED**

**a. Targeted Community & Brownfields, (i) Targeted Community Description:** Located in southwest Ohio, the City of Norwood is a small (3.14 mi<sup>2</sup>) urban community and longtime manufacturing hub of the Cincinnati region. Since 1970, Norwood has faced unique and significant events creating unaddressed environmental concerns and leaving the municipality economically devastated. Norwood's major GM assembly plant shut down in 1986 taking 9,000 jobs, and in 1990, a BASF Chemical plant exploded, resulting in human casualties and property damage along the City's main commercial thoroughfare.

Due to its severe circumstances, Norwood **has been recognized by the State of Ohio as one of only five "Situational Distressed Communities,"** since 2010. This designation is only issued to "a county or a municipal corporation that has experienced or is experiencing a closing or downsizing of a major employer that will adversely affect the county's or municipal corporation's economy." In the last three years, five of Norwood's largest and longest-running businesses announced closures or relocations. **These closures resulted in loss of more than 2,000 jobs, including four manufacturers, and decreased City revenues by 20%** (Section 1.a.iii), and alone created more than 35 acres of brownfields in the City.

These closures compound the poor local economic conditions and steady decline of Norwood's population. According to the U.S Census Bureau, Norwood has experienced a **36.9% population decline over 40 years**. The combination of these factors have placed Norwood near financial ruin, as its current tax revenues and operating budget are at the lowest point since 2005 (*Norwood Auditor's Office*).

<b>CITY OF NORWOOD EARNINGS TAXES DECLINE FROM 2009-2012</b>				
	2009	2010	2011	2012
Earnings Taxes	\$16,613,298.00	\$14,706,162.82	\$13,668,825.33	\$13,097,612.26

*Data from Norwood Auditor's Office*

The City's Comprehensive Plan, Housing Strategy Report, and Community Health Assessment guide Norwood's brownfield identification and redevelopment approaches. These plans were used to create a new form-based zoning code, adopted by Council in 2013, and a Citywide Community Revitalization Area (CRA) to incentivize brownfield and LEED-standard redevelopment projects. The City's brownfield program goals coincide with Livability Principles that support community stability and wellbeing and reduce the environmental and neighborhood risk factors posed to its residents.

The City's mission to attract and retain people to live, work, and raise families, underlies the economic vitality of this community. This Assessment Grant will help reverse the trends of declining job opportunities, population loss, deteriorating tax base, and disinvestment that Norwood's brownfield legacy has perpetuated.

The City of Norwood will address two distinct areas with this Assessment Grant. Norwood's largest commercial and industrial enterprises are located along Montgomery Road (US RT 22), and the Norwood Lateral (State Route 562, a major intercity east-west highway connector) with adjacent B&O Railroad. The four Census Tracts directly encompassing these two industrial routes is known as the **Montgomery Road/Norwood Lateral Target Area** (MR/NL), and generally includes Norwood's most concentrated brownfields clusters. Additionally, the small-scale industries and commercial developments (e.g.: petroleum service stations, tool and die facilities, laundry and dry cleaners, machine shops, etc.) in Norwood's dense residential areas are referred to as **Neighborhood Sites** (NS). These sites are generally located in Norwood's two southernmost Census Tracts.

Based on the City's preliminary brownfield identification efforts (Section 3), it is **estimated that more than 325 acres or 16% of the City's entire land area are brownfields, and that ALL of Norwood's residents are living within ¼-mile of a known or potential brownfield**. Relative to the City's Census Tracts, Norwood's susceptible residents (low-income, minority, and children) are facing the most risk from the effects of brownfield contamination. According to the Norwood Community Housing Strategy Report (2009), more than 74% of Norwood's homes were constructed before 1940, and 98% constructed before 1979. The age and physical deterioration of Norwood's housing stock leaves residents with insufficient protective barriers from the contamination of brownfields, and Norwood struggles with protecting these susceptible residents from the impacts of brownfield sites near their homes.

(ii) **Demographic Information:** Norwood is the second most populous city in Hamilton County with 19,207 residents, and has been among the five most densely populated communities within the County's 48 jurisdictions since 1970.

	NORWOOD	OHIO	NATIONAL			
Population*	19,207	11,536,504	308,745,538			
Unemployment (%) **	7.9%	7.5%	7.3%			
Poverty Rate***	19.8%	15.4%	14.9%			
Minority (%)^	13.4%	17.3%	27.6%			
Median Household Income***	\$37,157	\$48,246	\$53,046			
Median Existing-Home Price***	\$127,000	\$133,700	181,400			
<b>Norwood Census Tracts</b>	<b>252</b>	<b>253</b>	<b>254.01</b>	<b>254.02</b>	<b>255</b>	<b>256</b>
Population*	4,389	2,685	1,644	3,012	4,141	3,334
Poverty Rate***	15.5%	19.6%	18.9%	15.5%	24.3%	22.9%
Minority (%)^	15.9%	10.8%	11.6%	8.0%	19.7%	10.3%
Median Household Income***	\$36,906	\$39,714	\$41,098	\$38,087	\$36,063	\$34,314
Assessment Grant Target Area+	MR/NL	MR/NL	MR/NL	NS	MR/NL	NS

\*2010 US Census, \*\*Bureau of Labor Statistics, October 2013, \*\*\*2012 ACS 5-year survey, ^Minority defined as non-white population,

+MR/NL – Montgomery Road/Norwood Lateral Target Area, NS – Neighborhood Sites Target Area

Consistent with the County's demographics, Norwood's predominantly white, blue collar population is decreasing while other racial and ethnic groups are growing. Norwood's 36.9% population loss since 1970 is almost three times higher than Hamilton County's, which reported only a 13% decline since 1970 (*Hamilton County Regional Planning Commission, U.S. Census Bureau 1970-2010*). In the last decade, however, Norwood experienced growth among black and Hispanic or Latino populations. From 2000–2010, Norwood experienced a 188.4% increase within its black population, and a 142.39% increase within its Hispanic or Latino population. With a 5.1% Hispanic or Latino population **Norwood has the third greatest percentage of Hispanic or Latino inhabitants within Hamilton County** (*Hamilton County Regional Planning Commission, U.S. Census Bureau 2010*).

Of Norwood's 8,319 households, nearly 20% of the population and 12% of families are living below the poverty line, and **27% of Norwood's children live below the poverty line**. As a result our impoverished residents and families – including our growing concentrations of minority and young citizens – likely do not have sufficient resources to avoid the impacts of brownfields in their neighborhoods. Due to the socioeconomic factors tied to Norwood's Target Areas, these inhabitants are in most need of consideration and quality of life improvements.

(iii) **Brownfields:** Norwood's industrialization was launched with the 75-acre Cincinnati Pressed Brick Company in 1894. The plant's enormous size and success earned Norwood notoriety as a regional manufacturing hub, and the City quickly became home to other industry giants including: US Playing Card Co. (*relocated to Northern KY, 2012*), American Laundry Machine Co. (*dissolved, vacated 2004*), Norco (*closed 2009*), and Zumbiel Box (*relocated to Northern KY 2012*).

In 1923 the Nation's second GM assembly plant opened in Norwood, sprawling more than 3 Million square-feet on 59 acres. Within a decade of GM's opening 38 car dealers, repair and service shops, and 53 gasoline service stations had opened in the small community (*Norwood Historical Society*). Auto body manufacturers, foundries, and die-cast and tooling shops followed to support the automobile industry. GM's plant closure in 1986 catalyzed numerous business closures, decreased job opportunities, and a severe population decline.

For more than 25 years the Target Areas have been littered with vacant and obsolete factories, serving as a constant reminder of more prosperous times. A review of **current environmental database records identified 57 RCRA Generators of Hazardous Waste, 19 sites with known contamination in Ohio EPA's database, 96 leaking UST facilities, 75 active UST facilities, and 99 historic dry cleaners located within Norwood** (*Environmental Data Resources, Inc. Radius Map Report for Norwood, Ohio January 15, 2014*). These sites are distributed in all corners of the City's Target Areas, and must be evaluated for impacts on the local economy, environment, and health to local populations. The City has identified numerous potential assessment sites; a few of these include:

TARGET AREA <sup>+</sup>	SITE ID & ACTIVITIES	POTENTIAL CONTAMINANTS <sup>1</sup>
MR/NL	<u>Zumbiel Box Company</u> <i>Commercial Packaging Manufacturing: Design, Print, Die &amp; Plate Making</i>	volatile organic compounds (VOCs), petroleum, oils, chromium, metals
MR/NL	<u>US Playing Card Company</u> <i>Printing and Manufacturing of Playing Cards, Board Games, Accessories</i>	paints, metals (inks), chlorinated solvents, PCBs
MR/NL	<u>American Laundry/Norco, Surrounding Brownfields</u> <i>Historic Millworks, Dry Cleaning R&amp;D, and Commercial Laundry Equipment Manufacturing</i>	chlorinated solvents, petroleum fuel, PCBs, metals
40% MR/NL & 60% NS	Former Dry Cleaners <i>30 Known, Up to 99 Potential Dry Cleaners</i>	chlorinated solvents (VOCs)
MR/NL & NS	<u>Gas Station &amp; Auto Repair Facilities</u> <i><sup>3</sup>96 confirmed LUST sites, 4 Suspected LUST sites, 75 Active UST sites, 89 Archive Gas Stations, &amp; 175 Potential UST/Service Stations</i>	lead, VOCs, SVOCs, PAHs, TPH
NS	<u>Knowlton Manufacturing Complex (3 Bldgs.)</u> <i>Metal Works: Stamping, Tool &amp; Die</i>	chlorinated & petroleum solvents, oils, chromium (plating), metals
NS	<u>Norfolk &amp; Southern Rail Yard</u> <i>Railroad Tracks, Switching Areas, Engine Maintenance, Fueling, and Materials Storage</i>	polynuclear aromatic hydrocarbons (PAHs), petroleum hydrocarbons, PCBs, oils, metals, solvents

<sup>1</sup> Ohio EPA and Available Environmental Reports. <sup>2</sup> Agency for Toxic Substances and Disease Registry (ATSDR), *ToxGuides*. <sup>3</sup> EDR, Inc. *Radius Map Report for Norwood, Ohio January 15, 2014*. <sup>+</sup> MR – Montgomery Road/Norwood Lateral Target Area, NS – Neighborhood Sites Target Area

**(iv) Cumulative Environmental Issues:** The industrial clusters and excessive noise and physical hazards of the MR/NL highways presents an air quality pollution issue to adjacent residents, schools, and parks of this Target Area. The MR/NL encompasses 3 industrial plants listed in the Toxic Chemical Release Inventory System, the former City incinerator, a solid waste disposal site, high-voltage power lines, and RCRA Generators of Hazardous Waste. There are 57 RCRA Generators registered in Norwood, and 7 are currently in “Corrective Action” status. The NS Target Area is also affected by these RCRA Generators and an extensive communitywide list of former dry cleaners (more than 30 known in the City), plus 100 confirmed and suspected Leaking Underground Storage Tank (LUST) facilities, 75 actively-registered petroleum Underground Storage Tank (UST) sites, 89 identified historic gas stations, and 175 potential historic gas stations (*EDR Radius Map Report, Norwood, Ohio January 15, 2014*).

**b. Impacts on Targeted Community:** While the full impact of brownfields is unknown, the effects are a detriment that drain Norwood’s stretched tax dollars and municipal services to manage safety hazards from vacant buildings. In 2010 arson destroyed the former 70,000 square foot Norco plant and released asbestos at the site, and was the result of vandalism by an 11-year old trespassing in the vacant building. Norwood’s economic development efforts have also been impeded by brownfields because their prior uses create suspicion of contamination; the associated uncertainty of cost, timing, safety, and liability issues cause developers to seek sites elsewhere.

In addition to Norwood’s large brownfields, there are a multitude of gasoline stations, machine shops, smaller manufacturing plants, junk yards, landfills, and drycleaners that serviced the area’s population for over 125 years. These sites have not been assessed and represent threats to the environment, health and welfare of Norwood’s residents. Norwood has the highest rates of hospital admissions in Hamilton County for Chronic Obstructive Pulmonary Disease (*Catholic Health Partners’ 2013 Community Health Needs Assessment*), and the **Norwood City Health Department indicated that in 2011, 24.7% of the Department’s home and office visits were directed to residents with anemia, lead poisoning, nervous system damage, heart conditions, cerebral vascular, and respiratory conditions.** Statistics per Target Area are not currently available, but health benefits from activities supported by the Grant will include evaluating affected residents’ proximity to contaminated sites, and determining impact patterns to Norwood’s general and sensitive populations. This will be imperative at sites such as American Laundry/Norco, where a confirmed plume of chlorinated solvents in groundwater is, at minimum, migrating beneath the entire City block. The proximity and increased access to these uncontrolled and contaminated sites puts the Target Area’s sensitive populations (low-income, minorities, children and the elderly) at higher risk of detrimental health effects. These population groups are even more susceptible to the effects of

contaminants due to poor nutrition and decreased access to health care resulting from economic disadvantage.

TARGET AREA <sup>+</sup>	SITE ID	CENSUS TRACT	PERSONS SQ/MILE	POTENTIAL CONTAMINANTS <sup>1</sup>	HEALTH EFFECTS <sup>2</sup>
MR/NL	Zumbiel Box Company	254.01	4,032.34	VOCs, petroleum, oils, chromium, metals	Respiratory, anemia, cancer, nerve damage, liver and kidney damage
		253	4,268.26		
MR/NL	US Playing Card Company	254.01	4,032.34	paints, metals (inks), chlorinated solvents, PCBs	Liver/kidney damage, respiratory, anemia, cancer
MR/NL	American Laundry/Norco Block, Surrounding Brownfields	252	7,739.11	chlorinated solvents, petroleum fuel, PCBs, metals	Respiratory, cancer, target organ damage
		255	8,434.98		
NS	Knowlton Manufacturing Complex (3 Bldgs.)	254.02	5,574.59	chlorinated & petroleum solvents, oils, chromium (plating), metals	Respiratory, anemia, cancer, nerve damage, liver and kidney damage
NS	Norfolk & Southern Rail Yard	256	6,919.50	PAHs, petroleum hydrocarbons, PCBs, oils, metals, solvents	Respiratory, anemia, cancer, nerve damage, liver and kidney damage
40% MR/NL & 60% NS	Former Dry Cleaners	All 6 Census Tracts	6,113 (Average)	chlorinated solvents (VOCs)	Respiratory, cancer, nerve damage, liver and kidney damage
MR/NL & NS	Gas Station & Auto Repair Facilities	All 6 Census Tracts	6,113 (Average)	lead, VOCs, SVOCs, PAHs, TPH	Respiratory, cancer, nerve damage, target organ damage

<sup>1</sup> Ohio EPA and Available Environmental Reports. <sup>2</sup> Agency for Toxic Substances and Disease Registry (ATSDR), *ToxGuides*. <sup>3</sup> EDR, Inc. *Radius Map Report for Norwood, Ohio January 14, 2014*. <sup>+</sup> MR – Montgomery Road/Norwood Lateral Target Area, NS – Neighborhood Sites Target Area

As described in the table above, Norwood's brownfields in our dense residential neighborhoods, near schools, and public parks present a threat to human health through direct contact, ingestion of contaminants, and/or exposure to airborne particulates and volatile compounds. The migration of contaminants from brownfields, via storm water and groundwater, also poses a threat to the City's water resources. There are currently 45 water wells installed throughout Norwood (*Ohio Department of Natural Resources Water Well Log Report*). The Assessment Grant will enable the City to address environmental justice issues with which it is faced by delineating the extent of brownfields contamination, determining ways to control contaminant migration, and improving the health of its residents and the quality of its waters.

**c. Financial Need, (i) Economic Conditions:** By the early 1990s Norwood faced a fiscal crisis that required implementation of a financial plan developed by state officials. Due to the closure of GM, Norwood experienced municipal employee layoffs, elimination of municipal programs, and drastic reductions in police and fire services. At the time of its closure, GM's earnings and property taxes constituted 35% of Norwood's operating budget and one-fifth of the school district's funds. Less than one year after GM closed the City reported a \$1.9 Million deficit.

Norwood's already severely depressed economy faced additional stressors in the period that followed, and since 2009 the transition and continued elimination of Norwood's employment base has plagued its economic outlook. **More than 2,000 jobs were lost in 2009 – 2012 as five major employers, including four manufacturers and one medical research company, closed or built new facilities in neighboring Cincinnati and Northern Kentucky.** Medpace, a medical research company, moved 1,000 jobs to a new building site in Cincinnati, and Norwood's historic manufacturers US Playing Card Co., Zumbiel Box Co. moved to Northern Kentucky, accounting for another 1,000 lost jobs. These companies' facilities are vacant, and encompass 35-acres. Furthermore if these 2,000 jobs were still located in Norwood the potential earnings would be approximately \$2,750,000 – equal to 20% of the City's annual tax revenues. These depressing forces have been evolving yet constant for nearly 30 years, and have resulted in chronic distress for the local economy and our population.

Norwood's designation as one of only five Situational Distressed Communities statewide is a significant indicator

that its local economy is in peril (2010 – 2013, *Ohio Development Services Agency*). The City has suffered tremendous economic and population losses from major plant closures, back-to-back recessions, a decline in manufacturing, and overall elimination of its historic industrial base. The movement of industry to modern facilities in distant suburbs and other states has left urban first-ring suburbs like Norwood with declining job opportunities, increasing unemployment, declining tax base, and population decline. The depressed economic condition of our municipality prevents our ability to undertake the funding of critical initial assessments of our brownfields and ultimately position them for beneficial reuse.

Norwood's neighbors (Cincinnati/Port Authority/Hamilton County Coalition and Dayton, Ohio, Covington, Kentucky) have benefitted from the use of U.S. EPA assessment grants. At this time Norwood needs outside help to remain competitive; the City cannot further its brownfield program with the current level of revenue generation, and needs funding to begin assessing the numerous brownfield sites in the community – especially those in our Target Areas that present health and environmental hazards, limit redevelopment, and contribute to ongoing deterioration of neighborhoods and commercial and industrial districts. By providing money unavailable from local sources, this grant will propel Norwood's redevelopment efforts, and attract businesses with new employment opportunities for our residents.

**(ii) Economic Effects:** Norwood's residents are facing chronic economic stresses and disinvestment. Multiple economic downturns have left behind numerous abandoned and uncharacterized brownfields, threatening the health and welfare of the population, hampering economic growth, and decreasing tax revenue.

In addition to job loss, population loss, and tax revenue decline, Norwood's home values are depressed due the blighting impacts of proximate brownfields. This is further compounded by lower-than-average median household incomes and higher-than-average unemployment rates. Homeownership is a revitalization priority for Norwood; with 49% owner-occupied and 51% renter-occupied housing units it is staggering that only 1.1% of Norwood's homeowners are African American, and 0.9% of the City's homeowners identify themselves as Hispanic or Latino (*U.S. Census Bureau 2010*). This is indicative of a need for diversity among ownership, and for affordable homeownership options with financing programs designed for Norwood's minority populations. Although existing-home prices in the City are low, current owners cannot afford to move because their home equity is diminished, and potential owners facing Norwood's low-employment and low-income challenges will face difficulty securing homeownership financing. These factors present a disproportionate barrier to homeownership for Norwood's renting and low-income populations, primarily minorities, and contribute to transience within neighborhoods.

Since 2009 the City has partnered with local nonprofit and community groups to solicit residents' concerns and develop action plans to address the community's severe economic decline. Norwood partnered with Xavier University's Community Building Institute to develop the Norwood Housing Strategy Report, which is aligned with Comprehensive Plan goals to achieve sustainable, urban developments and affordable housing. The Norwood City Health Department also undertook a Community Health Assessment, including public outreach and a citizen-survey that revealed health and safety issues associated with vacant buildings is the third biggest concern of Norwood residents. This survey was completed before the Norco fire, which is a clear example of the burdens our brownfield sites are posing to public safety and municipal services.

The Plans collectively identified the City's "Growth Opportunity" redevelopment areas as Montgomery Road, Norwood Lateral, and historic commercial Neighborhood Sites, as having the greatest potential for new business development, new jobs, and new housing. These Growth Opportunity areas are presented as Target Areas (Montgomery Road/Norwood Lateral and Neighborhood Sites) for brownfield redevelopment due to their abundance within these Areas and the fact these brownfields are "high-impact" sites for redevelopment potential.

## **2. PROJECT DESCRIPTION & FEASIBILITY OF SUCCESS**

**a. Project Description, (i) Alignment with Community Plans:** The program supported by this Assessment Grant promotes Norwood's community revitalization, environmental protection, and population health/wellness goals woven throughout the Comprehensive Plan, Housing Strategy Report, and Community Health Assessment. Norwood's Comprehensive Plan clearly states redevelopment of deteriorated areas and revitalization of neighborhoods is a primary City objective. Taking steps to achieve this Norwood has invested in developing an appropriate zoning code and incentives for brownfield redevelopment (Section 4.b.), and has been an active partner



with private developers on prior brownfield redevelopment projects (Section 5.c.). The brownfield redevelopment program is another step toward meeting this objective because these sites represent Norwood's only real opportunity to create new, modern developments in the landlocked city. Unfortunately, as Norwood makes plans to undertake these projects it is faced with a diminishing municipal budget that cannot support the efforts without outside help.

With Assessment Grant funding, Norwood's brownfield program will be propelled forward and the City will leverage assessment outputs to move its brownfields through the cleanup and redevelopment process. Norwood has identified the following primary goals for its brownfields assessment program: 1) Assessment of sites in the industrial corridor MR/NL Target Area, and 2) Assessment of high-impact sites within dense residential neighborhoods, or Neighborhood Sites. Sites will be prioritized for use of funds based on factors including: brownfield eligibility, impacts and proximity to sensitive populations (including NCHD treatment patterns and neighborhood risk factors, Section 3.b.), immediate redevelopment potential aligned with community Plans (e.g.: creates new affordable housing, stimulates economic activity/job creation/new taxes, etc.) and ability to leverage existing infrastructure, prior confirmation of environmental contamination threatening residents and/or environment, and ownership/access cooperation. The City currently estimates that the allocation of Assessment Grant funds will be 60% to the Montgomery Road/Norwood Lateral Target Area and 40% to the Neighborhood Sites.

The City's land use plans for assessment sites support the Plans discussed herein and the form-based zoning code adopted in 2013. Redevelopment strategies will incorporate Target Area and specific neighborhood needs, and will encourage one or more of the City's written goals such as: attracting diverse businesses to create new jobs and taxes, promoting affordable homeownership opportunities and walkable neighborhoods, enabling redevelopment of Neighborhood Sites as safe-use "corner-stores" and mixed-uses appropriate to neighborhood needs, creating buffers from environmental health and safety concerns, and encouraging redevelopment in areas with existing infrastructure.

Based on experience Norwood is aware that a successful long-term redevelopment strategy, post-use of assessment funds, must include the ability to assemble funding packages that support as many elements of redevelopment as possible. Potential sources of funds have been identified in the following section, though entry into these programs is often predicated on having at least Phase I ESAs complete, and, often, Phase II ESA sampling. As a result, **Norwood faces a hurdle accessing these future funding sources due to a lack of available funding for initial site investigation activities.** To successfully revitalize our City through brownfield redevelopment, Norwood needs a source of readily available environmental assessment funds with which we can move brownfield sites through the early stages of due diligence. The City does not have access to any other funding sources to fulfill this need - the EPA Assessment Grant is now the critical factor. The City's brownfield redevelopment experience, new zoning and development packages to support appropriate land uses, and ability to leverage Assessment Grant funds for future financial support mechanisms in brownfield redevelopment, will deliver a successful Assessment Grant project and redevelopment program.

**(ii) Project Management:** Upon execution of the Cooperative Agreement, the City will immediately solicit and retain one or more qualified environmental consultants in a manner compliant with Federal procurement policies 40 CFR 31.36, including public announcement of the request for proposals, review, interview, selection and contract negotiation. Selected consultant(s) will prepare a Quality Assurance Project Plan for review and approval by the U.S. EPA, and will undertake subsequent inventory, assessment, and cleanup planning tasks in a manner and on a schedule to meet the project goals.

Within the first 7 – 8 months, Norwood, the Task Force (Section 2.a.iii), and consultant(s) will complete site prioritization for use of grant funds according to the criteria described in Section 2.a.i., and eligibility forms for the highest ranking sites will be prepared and submitted to the Ohio Bureau of Underground Storage Tank Regulations (Petroleum) and U.S. EPA (Petroleum and Hazardous Substances) to verify eligibility of each site prior to expenditure of Grant funds. The City will develop a Brownfields Property Profile Form for each site targeted for assessment through the Assessment Cleanup and Redevelopment Exchange System. The City will update the form regularly to track activities and accomplishments. Site access will also be secured within this timeframe.

Site assessment activities will begin with a Phase I Environmental Site Assessment (ESA) prepared in accordance with ASTM Standard E1527-13 to satisfy All Appropriate Inquiry and the Ohio Administrative Code (OAC) 3745-300-06 for the Ohio Voluntary Action Program (VAP), to identify recognized environmental conditions that may



indicate the presence of contamination. Where potential for contamination exists, the project consultant will design a Phase II ESA in accordance with ASTM E1903-97 and the VAP to investigate the areas of potential environmental impact. The consultant will provide a Sampling and Analysis Plan (SAP) and Health and Safety Plan (HASP) for U.S. EPA review and approval prior to initiating site investigation activities. Upon completion of data collection, the consultant will prepare a written assessment report for each site that will include describing types and concentrations of contaminant sources; evaluating and validating all data; compiling data into tables and figures; describing investigation methods; and comparing sample results with appropriate regulatory screening or VAP cleanup levels. The report will also provide recommendations for further assessment, the need for risk assessment, remediation, or abatement. Phase II ESA reports will be submitted to EPA as draft grant deliverables then finalized when comments are received.

Goals for our assessment program are to evaluate the nature and extent of site contamination, identify associated human and environmental exposures (onsite and offsite), evaluate potential impacts to human health and environmental media, assess environmental liability, and identify redevelopment issues. In this regard the project consultant(s) will work with the City, potential developers, and community partners (e.g., municipality or nonprofit groups) to devise liability management, cleanup, and site use strategies that support redevelopment efforts and improve the health of residents and the environment. Upon completion site assessment activities, the consultant will prepare site-specific cleanup plans for safe future use of contaminated sites, and that identify alternatives and costs to mitigate risks at each site. Cleanup standards will be established based on the intended use post-redevelopment (residential, commercial, etc.) to ensure protection of human health and the environment. The cleanup plan will utilize an initial screening process that identifies common and innovative approaches for remediation with regard to the type and concentration of contaminant sources and exposure pathways. Alternatives that hold the most promise for a reasonable range of costs will be carried forward to a detailed analysis phase that evaluates the alternatives against several criteria including: risk to public health, safety, and the environment; effectiveness; feasibility of implementation; applicability with federal, state, and local laws/regulations; overall feasibility (including the time necessary to implement the alternative); permanency; and cost. Selection of the preferred alternative for possible implementation will likely occur at a later date.

Assessment results will be continuously disseminated to the community through public meetings and notification of community stakeholders as described in Section 3.a. If imminent health threats to the community are identified, the Ohio EPA, Norwood City Health Department, and/or the Ohio Department of Health will be notified and their involvement requested (Section 3.b). As individual brownfield projects progress from cleanup to redevelopment, the public will be notified and comments/concerns will be solicited. The City, with assistance from the consultant(s), will submit required quarterly progress reports and annual financial reports to the U.S. EPA.

**(iii) Site Selection:** In 2011 the City's Economic Development Department began working with the public sector (e.g., Norwood Health Department, Norwood City School District), private sector (e.g., Cincinnati Children's Hospital, commercial lenders, and real estate professionals), and the non-profit community (e.g., Xavier University's Community Building Institute (CBI), community development corporations, and environmental groups) to identify potential brownfield sites. Importantly, this group is largely comprised of Norwood residents with a vested interest in the success of the brownfield program. The group, or "Task Force", collectively developed the prioritization criteria to align with the City's Plans, as discussed in Section 2.a.i., which will be used to evaluate brownfield sites for use of Assessment Grant funding. The City will remain engaged with the Task Force during Assessment Grant implementation to solicit new sites for the inventory and ensure maximum community benefit from the grant funds. At regularly-scheduled intervals the City and Task Force representatives will meet with the City's environmental consultant(s) to discuss project status and plans for completion of outreach activities. Please refer to Section 3.a. for information related to citizen and community stakeholder outreach and input in site selection and other important phases of grant implementation.

Upon completion of the brownfield inventory, the City will work with Task Force members and consultant(s) to rank sites based on prioritization criteria. Ownership information will also be determined at this time. Individual site funding eligibility will be verified with the appropriate regulatory offices. Owners of eligible sites will be personally contacted via certified mail, telephone, and/or in-person to review program objectives, assessment process, and secure access for work with a Site Access Agreement. As a guide Norwood will utilize Ohio EPA's customary Consent to Access agreement for Targeted Brownfield Assessment projects. Upon authorization to access the property, the project consultant will design a site-specific scope of work appropriate to address the issues associated

with a particular brownfield. The project consultant will complete Phase I ESA and subsequent investigations in the manner described above and according to the project schedule. In the event site access is denied by the property owner, Norwood will initiate discussions and secure site access for the next eligible site of highest priority ranking, and follow the public and assessment process as described. Given Norwood's history with successful brownfield redevelopment outcomes, the abundance of brownfields within our Target Areas, and the popularity of Ohio's statewide program for Phase II and cleanup funding, property owners will likely be enthusiastic to participate in the Assessment Grant process.

***b. Task Description and Budget Table***

**Task 1 – Programmatic Costs:** The budget includes programmatic costs of \$1,000 (hazardous substances) for materials and printing program materials associated with the grant inventory and assessment functions. The travel budget of \$2,500 (petroleum) is dedicated to attendance of one person at one U.S. EPA Brownfield Conference and one brownfields training program (\$1,250 per trip). Norwood is providing in-kind staff resources (est. \$5,000) related to documenting the brownfield site inventory/selection/assessment process and coordinating/conducting operational meetings.

**Task 2 – Community Outreach:** The budget includes community outreach costs of \$1,250 for each grant. These costs are based on Contractual costs of \$250 per grant for Spanish-language translation services of documents and at Public Meetings, plus \$750 per grant for City costs to prepare, print, mail, and advertise project information and documents. Travel costs of \$250 per grant are for travel to meetings and community outreach events. The City is providing in-kind staff resources (est. \$5,000) to conduct outreach meetings, update the City website with project updates and details, and undertake other activities in support of the City's outreach program.

**Task 3 – Site Inventory:** The budget includes site inventory development costs of \$750 for each grant, which will include \$250 per grant for travel costs associated with identifying and cataloguing sites, and \$500 per grant for costs associated with creating a matrix/method and forms to implement site prioritization. These activities will also be supported by the retained environmental consultant(s) for an estimated Contractual cost of \$1,250 (petroleum).

**Task 4 – Site Assessment:** The budget includes site assessment costs of \$181,500 (hazardous substances) and \$174,500 (petroleum). All are Contractual costs to pay an environmental consultant for these assessments, and are based on an average Phase I ESA cost of \$3,500 each, and average Phase II ESA cost of \$30,000 each. The costs for hazardous substances assessments are based on conducting 9 Phase I ESAs and 5 Phase II ESAs, while costs for petroleum assessments are based on conducting 7 Phase I ESAs and 5 Phase II ESAs.

**75% of Assessment Grant funds are dedicated to Phase II ESAs.**

**Task 5 – Cleanup Planning:** Depending upon the nature and complexity of the necessary remediation, Norwood intends to prepare a total of 4 Cleanup Plans – 2 for sites contaminated with hazardous substances, and 2 for sites contaminated with petroleum. Based on an average cost of \$7,750 each, the budget costs are \$15,500 (hazardous substances) and \$15,500 (petroleum), and are Contractual expenses for an environmental consultant to prepare the plans. The task may also include assessment of brownfields cleanup and redevelopment alternatives and evaluation of institutional and/or engineering controls, at a cost of \$4,250 (petroleum), and will be prepared by the environmental consultant. Sites selected for cleanup planning will offer a high redevelopment potential combined with measurable community, health, environmental, and economic benefits.

<b>BUDGET CATEGORIES</b> programmatic costs only	<b>TASK1</b> Programmatic Costs	<b>TASK2</b> Community Outreach	<b>TASK3</b> Site Inventory	<b>TASK4</b> Site Assessment	<b>TASK5</b> Cleanup Planning	<b>TOTAL BUDGET</b>
<b><i>Hazardous Substances Assessment Grant Project Tasks</i></b>						
Personnel						
Travel		\$250	\$250			
Supplies	\$1,000	\$750	\$500			
Contractual		\$250		\$181,500	\$15,500	
<b>Total</b>	<b>\$1,000</b>	<b>\$1,250</b>	<b>\$750</b>	<b>\$181,500</b>	<b>\$15,500</b>	<b>\$200,000</b>

<b>Petroleum Assessment Grant Project Tasks</b>						
Personnel						
Travel	\$2,500	\$250	\$250			
Supplies		\$750	\$500			
Contractual		\$250	\$1,250	\$174,500	\$19,750	
<b>Total</b>	<b>\$2,500</b>	<b>\$1,250</b>	<b>\$2,000</b>	<b>\$174,500</b>	<b>\$19,750</b>	<b>\$200,000</b>

**c. Ability to Leverage:** Assessment Grant funds are vital for catalyzing brownfield redevelopment because they fund initial site assessment needed to support project feasibility, design, liability management, and remediation planning. However, this redevelopment support alone is rarely sufficient to ensure a successful redevelopment. Additional human and financial capital in the form of in-kind services, grants, loans, tax abatements and credits, and/or tax increment financing usually are needed to make a project economically feasible by paying for additional environmental assessments and remediation, hazardous materials assessment and abatement, demolition, site preparation, and infrastructure upgrade, etc.

In Ohio, the single largest source of additional funding to ensure successful brownfield redevelopment is through the Clean Ohio Fund, renamed "JobsOhio" in 2013. A project Phase I ESA is a prerequisite for access to JobsOhio funds; which can support for further site investigation and/or cleanup – including asbestos surveys, Phase II ESAs, demolition, removal of contaminated soil and groundwater, construction of engineering controls, and a host of other remediation activities.

Norwood successfully received and administered more than \$3 million in Clean Ohio Fund assessment and cleanup grants since the program started in 2001 (Section 5). Based on prior experience, funds and services in addition to these may be required to bridge the gaps between assessment, cleanup, and opening a new business. Norwood can also tap into other U.S. EPA brownfield grants and the State's brownfields redevelopment "toolbox" to help leverage the Assessment Grant funds and fill redevelopment funding gaps. The following table presents a partial list of other appropriate funding sources, beyond JobsOhio, which may be leveraged to ensure completion of brownfield projects assessed with Assessment Grant funds:

*Brownfield Revolving Loan Fund (RLF)*  
*Water Pollution Control Loan Fund*  
*CDBG Funds*  
*Ohio Tax Increment Financing Program*  
*Community Reinvestment Area Tax Exemptions*

*Ohio Water Development Authority*  
*U.S. EPA Brownfield Cleanup, RLF &*  
*Supplemental Funding & Assessment Grants*  
*Ohio Tax Commission VAP Tax Abatement*  
*Developer Equity or Developer Cash*

The City has the staff and qualifications to effectively manage and support brownfield redevelopment. What is lacking to initiate the redevelopment of brownfield sites is funding. Assessment Grant funds will provide the needed stimulus to move Norwood's brownfield redevelopment program forward, promoting economic growth opportunities per the Comprehensive Plan, and generate outputs that provide prerequisite levels of environmental assessment for entry into other assessment, cleanup, and site development funding sources.

### **3. COMMUNITY ENGAGEMENT & PARTNERSHIPS**

**a. Community Involvement & Project Communication:** The City is committed to providing its citizens and stakeholders ample opportunity to become informed about, and provide input into, all phases of the brownfields program. Norwood proposes a continuous community outreach program that includes at least six public and stakeholder meetings (held at centrally-located City Hall), regular update meetings with the Task Force (Section 2.a.iii), and ongoing project milestones and updates announced on the City's website.

Following notice of an Assessment Grant award by the U.S. EPA, Norwood will announce the award to the community through a press release to the *Norwood Star* newspaper and *La Jordana Latina* a local Spanish-language newspaper, and by posting notices on community partners' websites. The City will also place advertisements on local radio stations (WAIF-88.3 FM, WMKV-89.3 FM, and WVXU-91.7 FM) and *La Mega* (WOXY-97.7 FM), the region's Spanish-language radio station, to reach the growing Hispanic and Latino population segment. Norwood has budgeted for translation of materials and translator services for public meetings, and will make arrangements with the City Health Department to address any other need as identified.

The primary post-award community input will be focused on preparation of the grant Work Plan and final budget, and will be posted on the City website. Hard copies will be available at City Hall and the Public Library to ensure access for those without computer/internet technology or experience. Document availability and solicitation of comments will be announced to the public via the City's website, the media outlets discussed above, and notifications to key community groups identified in Section 3.b. Comments regarding the proposed project and allocation of grant funds will be accepted verbally, in writing, and publicly discussed during Public Meeting #1. The draft Work Plan will be modified as appropriate in response to relevant comments, and all comments and respective responses will be summarized in the final Work Plan.

Following Work Plan approval, the City will seek public input regarding the brownfield inventory at Public Meeting #2, following notification using the above described procedures. Constituents will be acquainted with project objectives and operational principles. Norwood will solicit nominations for the brownfield inventory, review site prioritization criteria, and request information from and about interested developers and/or redevelopment goals. The City will incorporate sites nominated by citizens and community organizations into the brownfield inventory and determine site prioritization criteria. Upon site selection for funding, the public will be notified as described above, and the City will report the inventory and site selection results on the City website. Community groups proximate to target sites will also be engaged so that focused outreach can be conducted through those groups. The City will host Public Meeting #3 to discuss the sites, rationale for site selection, assessment process, and outline expectations during and after site assessment.

Upon completion of Phase I ESAs, the City will provide assessment findings, discuss sites proposed for Phase II ESA sampling, and familiarize the community and stakeholders with the process, activities, timing and expectations at Public Meeting #4. Similarly Norwood will host Public Meeting #5 upon completion of Phase II ESAs to distribute and discuss sample results and conclusions, and to explain health and environmental impacts of findings. If health threats are identified, the Norwood Health Department (NHD) and, where appropriate, Cincinnati Children's Hospital, will become partners in community involvement and education (Section 3.b). These groups will be integral in explaining health concerns and, if assessments identify potential health threats to the community, helping find solutions.

When cleanup and/or redevelopment planning is initiated for a site, more intensive involvement activities, including additional public meetings, explanations of plans and rationales and solicitation of comments and feedback on those plans, will be implemented. At the close of the project the City will announce the results of the assessment and cleanup planning activities conducted under the grant at Public Meeting #6 to ensure that all residents and interested parties are included in the process from start to completion. The City's community outreach program will continue through site use planning, site plan approval, and zoning review as site redevelopment progresses. The City will produce informational sheets corresponding with each Public Meeting to be posted online, and will host subsequent public meetings if additional information regarding the brownfield project is requested by citizens or stakeholders during project implementation.

***b. Partnerships with Government Agencies, (i) Local Health Officials:*** The City has developed partnerships with agencies at various levels of governance, and believes in the benefits of forging new relationships to leverage resources and expertise. The City will utilize local and state environmental/health agencies to ensure that the project is successful.

The Norwood Housing Strategy indicates 98.1% of Norwood's housing was constructed prior to 1979; the physical condition, deterioration, and potential for exposure to hazardous building materials represent a health risk, especially to sensitive residents (e.g., pregnant women and the very young). Ohio Department of Health also identifies Norwood as a High-Risk zip code area for blood-lead poisoning. Due to these factors Norwood City Health Department (NCHD) offers free lead testing for children, abatement assistance (free HEPA-Vacuum rentals), educational support programs, and in-home assessments of health and home environments to identify and abate lead-poisoning sources. The City maintains a staff of Registered Nurses who provide other free in-home services including medication management, physical exams, infant immunizations, and educational materials related to nutrition, Ohio Medicaid, lead risks, child development, and other safety information.

With NCHD's established programs, their offices have earned residents' trust as a reliable resource. NCHD's in-home service patterns or other firsthand knowledge of neighborhood factors will be used as a consideration during

site inventory and prioritization Grant activities. The outputs produced through use of Assessment Grant funds will be used by NCHD to identify or verify offsite health threats, identify related toxicological issues, perform risk evaluations with assistance from the Agency for Toxic Substances and Disease Registry (ATSDR), as needed, design and conduct notification/education programs, and coordinate health testing if brownfield-contaminant migration is confirmed.

NCHD will rely on Phase II ESA data to discern and document any detectable patterns (geographic, safety/criminal/behavioral), and evaluate the presence of any disease or symptomatic clusters that would indicate environmental, health, or safety issues associated with brownfields. This level of brownfield-related health evaluation has never been available with City's resources, and will provide a higher level of support to protect community health.

Norwood established a partnership with Ohio EPA's Central and Southwest Districts during prior brownfield projects and seeking Ohio Voluntary Action Program (VAP) approvals for site activities, and has maintained a positive relationship with these teams. The City will work with Ohio EPA during this grant implementation to ensure appropriate assessment and cleanup activities occur at brownfields sites. This project will be conducted in compliance with the rules and guidance documents promulgated by Ohio EPA as defined by Ohio's VAP. Partnering with Ohio EPA staff will be important for acquisition of technical support, resolution of regulatory or procedural issues, and interpretation of rules and guidance documents. When contamination is confirmed at sites, cleanup criteria established by the Ohio EPA under the Ohio VAP will be used to identify and address onsite threats to health and the environmental posed by the constituents detected. If contamination has the potential to negatively impact the health of local populations, especially as related to off-site exposures, the Ohio EPA, Ohio Department of Health, and Norwood City Health Department will be notified and brought in as project partners.

**(ii) Other Agency Partnerships:** The City works closely with Hamilton County, the Port of Greater Cincinnati Development Authority, and Ohio Development Services Agency to jointly promote economic development, to discuss brownfield redevelopment within the City, and to engage and strengthen the City's businesses through information sharing. The City welcomes working very closely with the designated U.S. EPA Project Manager and with Region 5 during implementation of an Assessment Grant.

**c. Partnerships with Community Organizations:** Norwood will continue developing partnerships and involving specific stakeholders (e.g.: potential developers, lenders, and local business leaders), who are critical to the success of brownfield redevelopment in the City. These groups' input will be valuable as it relates to the highest/best redevelopment uses of sites based on market conditions; identification/solicitation of potential developers; and financial options/mechanisms for funding future site preparation activities.

Norwood will also use this opportunity to continue building on existing relationships with community groups, many of whom are members of the Task Force (Section 2.a.iii), and have been instrumental in developing Norwood's brownfield program. The City has defined two distinct roles for community-based organizations: the first role is participation in the Task Force for identification and prioritization of brownfield sites for assessment, the second role is supporting information sharing and feedback collection – such as notifying constituents about the grant, educating the community about the grant process, and reporting on the progress of assessments in their areas of interest. A description of the contributing organizations that will actively participate in the project is provided below; Support Letters for this project from these and other groups are included in Attachment iv.

COMMUNITY ORGANIZATION PARTICIPANTS & ROLE
<b>Woven Oak Initiatives</b> , a non-profit organization providing a home for small programs focused on education and mentorship to serve the common good. Serves as community-connector, providing opportunities for dialogue, service and relationship-building. Role: Site ID/Prioritization & Information Sharing/Outreach
<b>Community Building Institute</b> , a non-profit supported by Xavier University specializing in facilitation of long-term neighborhood projects to effect measurable community transformation. Focuses community-driven development that emphasizes existing physical assets and the passion of residents rather than simply constructing buildings and fixing problems. Role: Site ID/Prioritization & Information Sharing/Outreach
<b>Preventing Injuries in Norwood</b> , community partnership of private and public neighborhood agencies to implement injury prevention policies, educational community programming and school-based projects promoting safety. Role: Site ID/Prioritization & Information Sharing/Outreach

<i>Norwood Chamber of Commerce, business federation with direct link to local businesses and stakeholders. Role: Site ID/Prioritization &amp; Information Sharing/Outreach</i>
<i>Hispanic Chamber of Commerce, business federation promoting growth among local Hispanic or Latino businesses. Role: Site ID/Prioritization &amp; Information Sharing/Outreach</i>

#### **4. PROJECT BENEFITS**

**a. Health, Welfare and Environment:** The Assessment Grant will help protect public health and welfare by restoring control of contaminated sites through assessment, cleanup, and strategic redevelopment. Restoring control removes threats and eliminates exposures, critical steps for protecting the general public and sensitive populations. Threats to residents can be mitigated by 1) bringing these sites and associated hazardous materials to the public's attention, 2) completing site assessments that identify the presence and extent of contamination, and 3) directing remediation and redevelopment to re-establish site control through engineering and/or institutional controls. While the City has not yet determined which brownfield sites will be assessed with grant funds, examples presented below describe the benefits we would expect to realize through redevelopment of previously-identified brownfields suspected to be contaminated. Actual site selection will be guided by priorities described in Section 2.

<b>SITE ID</b>	<b>HEALTH AND/OR WELFARE &amp; ENVIRONMENTAL BENEFITS OF REDEVELOPMENT</b>
Zumbiel Box Company	<i>Petroleum and solvent USTs will be removed; chromium, petroleum, and solvent contaminated soil and groundwater will be identified and cleaned up to address vapor intrusion, inhalation, and direct contact issues at the immediately adjoining City park and to adjacent Hispanic and low-income residents. Allows for safe conversion of the existing +100,000 square-foot structure into professional office space or urban "loft" style multi-family housing complex.</i>
US Playing Card Company	<i>Onsite soil contamination will be removed to eliminate any direct-contact risks from PCBs, metals, and chlorinated solvents stored onsite; Groundwater contamination from solvents will be defined and cleaned up to protect adjoining residents from inhalation and vapor intrusion. The 20-acre site, situated in a residential neighborhood, is suited for a mixed-use commercial and affordable-residential campus; Also eligible for historic preservation tax credits due to building features and age.</i>
American Laundry/Norco Block Surrounding Brownfields	<i>The extent of confirmed chlorinated solvent-impacted groundwater will be identified and cleaned up to address vapor intrusion and inhalation concerns for <u>Norwood's highest minority and lowest-income residents</u>, students, and area workers. If necessary, vapor extraction or barrier systems will be installed in adjoining residences and businesses to mitigate solvent vapor exposures. The 15-acre "block" immediately encompassing the former facilities has premier visibility from both City highways, and is targeted to centralize a new commercial/office hub within the City. The City is actively marketing the area, but redevelopment is hindered by uncertainty of extent and impacts of contaminated-groundwater migration.</i>
Norfolk & Southern Rail Yard	<i>Remove onsite USTs and address soils and groundwater contaminated by PAHs and petroleum products; Define extent of PCBs, metals, and solvents in soil or groundwater and cleanup by removing soil to prevent direct contact and airborne inhalation exposures, control surface water runoff, and cleanup groundwater from solvents or petroleum chemicals to address vapor intrusion and inhalation to residents. The City has targeted this property as ideal for re-use as part of the "Wasson Way Bike and Pedestrian Trail", a Xavier University-led project creating a 6.5-mile mixed-use trail that links 8 local neighborhoods to the existing Little Miami Bike Trail.</i>
Knowlton Manufacturing Complex (3 Buildings)	<i>Contamination from onsite chemical use and storage will be assessed; any soil contaminated with chlorinated solvents, chromium/metals, and petroleum products will be removed to eliminate direct contact and inhalation exposures and to prevent runoff to stormwater or migration to groundwater. Extent of groundwater contamination will be verified and cleaned up to prevent solvent vapor intrusion in surrounding homes. Due to surrounding dense residential uses, this site will be evaluated for safe re-use as affordable housing or mixed-use residential with commercial component tailored to specific neighborhood needs.</i>



Former Dry Cleaners	<i>The extent of chlorinated solvent-contaminated groundwater will be determined, and cleanup will begin in needed. Vapor extraction or barriers will be installed as necessary to protect adjoining residents from inhalation exposures. Former dry cleaning buildings, once vapor intrusion is mitigated, can be safely converted for mixed-use commercial/residential uses.</i>
Gas Station & Auto Repair Facilities	<i>Petroleum USTs will be removed; any impacted soil or groundwater will be identified and remediated to prevent future inhalation, vapor intrusion, and groundwater plume migration concerns. Sites can be redeveloped with mixed-use projects to support local neighborhoods.</i>

**b. Environmental Benefits from Infrastructure Reuse, (i) Planning/Policies:** Based on the Comprehensive Plan and Housing Strategy reports, Norwood adopted new public policy to support Livability Principles and Sustainability in development. In 2009 Norwood designated a citywide Community Reinvestment Area by Ordinance making brownfield redevelopment projects and LEED-certified projects eligible for tax exemptions. In 2013 City Council also approved a new form-based zoning code to encourage infill development and promote walkable neighborhoods. These policies support sustainable redevelopment, and were developed by the same staff that will be managing the Assessment Grant.

As Norwood is a densely populated and established community, its brownfields offer access to existing infrastructure such as roads, railroads, mass transit, utilities, water lines, and sanitary lines. **Infrastructure reuse eliminates the need to build new systems as is required for greenfield development, and epitomizes sustainable redevelopment.** To promote infrastructure reuse within the brownfield program, Norwood is using this as a prioritization criterion for site selection and use of Assessment Grant funds.

Norwood has a track record of encouraging green remediation practices: during prior Clean Ohio grant-implementation, **Norwood encouraged building deconstruction and donation of supplies** to Building Value, a local non-profit organization that salvages reusable building materials for resale to the public. Building Value employs persons living with disabilities and teaches skills related to the deconstruction of a building by hand. Salvaged items from the deconstruction process (doors, furniture, windows, hardware, etc.) are returned to the company warehouse where they are sold at a discounted rate. This retail component provides a more affordable option for lower-income individuals wishing to replace these necessities within their homes. Involving organizations such as Building Value **drastically reduces the amount of material that would typically be disposed in a landfill** while also creating affordable building materials and employment training. If demolition is planned, the City also strongly **encourages recycling and/or reuse of demolition debris as backfill material**. The City will utilize, as applicable to each redevelopment project, U.S. EPA best practices in demolition debris management.

**(ii) Supporting Livability Principles:** The City, working with Cincinnati and Xavier University, participated in the former BASF Chemical plant (Census Tract 256) remediation and redevelopment. The cleanup, completed in 2013, is enabling the site to be redeveloped with a mix of housing and commercial uses that promotes equitable, affordable housing; supports economic growth and introduce new jobs opportunities within the community (enhances economic competitiveness); and is a mixed-use “land recycling” development that supports an existing community. The new land uses are consistent with the City’s new form-based zoning code, which also inherently exemplifies these Livability Principles. The project was also awarded New Market Tax Credits (U.S. Department of Treasury, Community Development Financial Institutions Fund), which leverages federal investment. The overall project creates a pedestrian-centered residential, retail, and commercial investment area within our urban environment. This vision values our urban makeup, and enhances our neighborhoods.

**c. Long-Term Economic Benefits, (i) Economic:** Brownfield redevelopment is a key element of Norwood’s economic recovery. To ensure long-term gains Norwood’s site prioritization criteria include the ability of a property to provide economic benefit for the community through private investment, job creation, and contributions to the local tax base.

Norwood will also leverage Grant outputs in multiple capacities. As one example, the Brownfield Inventory and Technical Reports will be used to 1) ensure consistent alignment with the existing, community-supported Comprehensive Plan, Housing Strategy, and Community Health Assessment; 2) guide future community-wide economic development plans, and identification of additional sources of capital to ensure project completion and future program success; and 3) market sites and attract potential developers. Specifically, once environmental site conditions are determined the City will engage developers and discuss plans for accommodating new development



based on assessment results. This approach will help Norwood overcome the hurdle of developer-uncertainty related to the brownfield cleanup process and cost. The program design also produces the benefit of preserving the natural environment through redevelopment of sites equipped with existing site improvements and infrastructure, and saves development costs typically incurred at greenfield sites.

Since the industrial base began transitioning away from Norwood, the City has focused on diversifying its employment base in professional, retail, and service sectors to limit the effects of drastic economic swings and disproportionate impacts from a particular market sector. Where feasible, Norwood will create attractive development sites by consolidating multiple adjacent brownfields (e.g., American Laundry/Norco, and Neighboring area, or at former gas station/auto repair shops, etc.) into larger parcels that provide flexibility and appeal to developers. Based on experience Norwood is hopeful that some grant-funded assessments could determine that certain perceived “problem-properties” do not require cleanup, yielding sites available for immediate redevelopment as much-needed high-density professional, commercial, and affordable residential units.

Future taxes generated through redevelopment may also be captured through tax increment financing programs and used in a self-sustaining manner to fund additional redevelopment activities (demolition, remediation, abatement, etc.) that will stimulate more projects, in turn, generating more new taxes. Increases to the City’s operating budget will directly result in expanded services to residents. The combination of these opportunities is expected to improve living conditions and quality of life to all of Norwood’s residents. Additional benefits will be realized by those living in Norwood’s Target Areas (the disadvantaged and high risk neighborhoods) through the elimination of blight and improved environmental quality and safety of the neighborhood.

Activities supported by the Assessment Grant will enable Norwood to integrate brownfields into business recruitment efforts that achieve Comprehensive Plan goals of stabilizing and diversifying the local economy, increasing income and property tax revenues, encouraging population growth, diversification, and homeownership, and increasing new employment opportunities to expand and diversify the City’s workforce.

*(ii) Promoting Local Hiring:* The City is supportive of employees trained through the use of Cincinnati’s Brownfield jobs training program, and has previously utilized these resources during local implementation of the Countywide Neighborhood Stability Program demolition projects. Norwood will also require its prime contract holders to maximize the inclusion of local area subcontractors in any sub-bidding process.

## **5. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE**

*a. Programmatic Capability:* Norwood’s Economic Development Department (EDD) is qualified to undertake the responsibilities associated with this Grant, including completion and submittal of a Cooperative Agreement and Work Plan to the U.S. EPA; enrollment in the Automated Standard Application for Payments system; and submittal of progress reports to the U.S. EPA Project Officer, specifying assessment tasks completed, financial tracking, and proposed grant activities. The EDD office is supported in administrative and contract management by the Law Department, fiscal management by the Auditor’s Office, and will carry out all technical reporting within EDD with assistance from the environmental consultant(s). The EDD will establish an interoffice system of project tracking with key communications regarding deliverables and deadlines, to ensure timely execution of the project.

The Project Director will be Mr. Gerry Stoker, Economic Development Director and Building Commissioner. Mr. Stoker has been with Norwood since 2009, and personally managed all aspects of Norwood’s Clean Ohio funded-brownfield assessment and cleanup projects. Mr. Stoker is responsible for creating the CRA designation in Norwood for brownfield and LEED-certified redevelopment projects. Mr. Stoker will be assisted internally by Mr. Greg Orosz, Norwood’s City Planner. Mr. Orosz was instrumental in developing the City’s form-based zoning code and working with Xavier University on collaborative projects including the Housing Strategy and Wasson Way bike trail project. Mr. Orosz typically accompanies Mr. Stoker in meetings with potential developers to design site plans that maximize the reuse of infrastructure and community assets.

The City understands that specific technical expertise and resources are needed to effectively perform the project, and will retain a qualified environmental consultant(s) to assist in managing the activities funded by the Assessment Grants. The City will procure the services of the environmental consultant(s) through a compliant competitive bid process, and will include evaluating the consultant(s) prior U.S. EPA Grant management experience, familiarity

with the grant process and deliverables required by U.S. EPA, and their ability to assist in community outreach and education. Firms will also be evaluated on their experience with the following: Ohio EPA's VAP regulations, and Ohio EPA requirements and policies; environmental due diligence; transactions of environmentally impaired property; environmental site assessments; and brownfield redevelopment and financing.

**b. Audit Findings:** Norwood has had no adverse audit findings to report in this section.

**c. Past Performance & Accomplishments, (ii) Never Received an EPA Brownfields Grant, but Has Received State of Ohio Assistance, 1. Purpose & Accomplishments:** Norwood has only received brownfield grants through the Clean Ohio Fund, which began in 2001. Norwood successfully administered more than \$3.6 Million in Clean Ohio funds, which are competitive grants awarded by Ohio's EPA and Economic Development offices for property-specific Phase II sampling and subsequent cleanup.

PROJECT ID & SIZE	CLEAN OHIO FUNDS	POTENTIAL PRIVATE INVESTMENT	GRANT PURPOSE/ACTIVITIES	GRANT DATE
Former NORCO Property – 4 Acres	\$730,000	\$5,000,000	Asbestos abatement, clay-cap engineering control install due to solvent-contaminated groundwater plume migrating onsite from offsite source	2011
Former American Laundry Facility– 6.5 Acres	\$234,000	\$8,000,000	Phase II Assessment due to historic manufacturing, solvent use/storage	2011
	\$2,489,000		Soil & groundwater cleanup from chlorinated solvents	2012
Former Smith & Nixon Piano Factory – 4.2 Acres	\$218,000	\$600,000	Phase II Assessment due to onsite chemical use and manufacturing <i>Phase II Result: No Cleanup Needed</i>	2012

Simply stated, Norwood's goals for its brownfield program are to reduce environmental threats within our neighborhoods and improve economic conditions. The City has been, and will continue to be, diligent in measuring outputs and outcomes from the application of grant funds. Clean Ohio measures success by private investment leveraged and potential jobs created through use of grant funds. As the City's grant projects are very recent, all outcomes have not yet been realized; a brief summary of these measures is provided below.

OUTPUTS	OUTCOMES/ANTICIPATED OUTCOMES
4 Public Meetings Held 3 Phase I Assessments 3 Phase II Assessments 1 Asbestos Abatement 2 Cleanup Plans Developed/Implemented 1 No Further Action Letter Pending	1 Site Identified Posing Offsite Risks 3 Sites with Committed Developers > \$13 Million in Private Redevelopment – <i>Anticipated</i> Job Creation, Tax Revenues – <i>Anticipated</i> Nearly 15-Acres of Brownfields Assessed & Cleaned 1 Covenant Not to Sue (Upon Ohio EPA NFA Approval)

**2. Grant Compliance:** Two private developers were associated with the Clean Ohio projects listed above. Upon their independent completion of Phase I ESAs and site development planning, the City entered into Development Agreements with the entities to apply for and secure funds, and manage the grant process. The City's responsibilities under the grants included: completing the State's public notice and input process; posting application documents to the City's website; procuring, through competitive process, qualified environmental consultants and contractors to perform grant-funded assessments/cleanup; overseeing all aspects of grant administration such as verifying deliverables and technical reports according to the grant schedule, producing regular progress reports of work completed and upcoming for Ohio EPA and Ohio Department of Development, communicating progress within the community, and hosting site visits with appropriate regulatory agencies. The City was also responsible for financial duties, including monitoring all grant expenditures and tracking the project budget, and preparing/submitting/issuing disbursement requests for payment of consultant and project contractors. **In every instance, Norwood met all administrative, reporting, and financial requirements, and delivered the expected results before the grant completion dates and within the project budgets.**

## **ATTACHMENTS**

*Attachment I - Threshold Documentation*

*Attachment II - Letters from State Environmental Authority*

*Attachment III - Documentation of Applicant Eligibility*

*Attachment IV - Letters of Support*

*Attachment V - Documentation of Leveraged Funds*

*Attachment VI - Justification for Requested Waiver of Funding Limit*

*Attachment VII - Property-Specific Determination Request*

*Attachment VIII - Letters of Commitment from Assessment Coalition Members*

*Attachment IX - Petroleum Eligibility Determination*

*Attachment X - Special Considerations Checklist*

**ATTACHMENT I**

***Threshold Documentation***

THRESHOLD CRITERIA FOR ASSESSMENT GRANTS	
1. Applicant Eligibility	City of Norwood, Ohio is a General Purpose Unit of Local Government and meets the definition of "Local Government" as defined in 40 CFR 31. City of Norwood has not received any grants or funds from EPA, nor participated as a Coalition member. The City is therefore eligible to apply under this assessment competition.
2. Letters from State Environmental Authority	Letters of acknowledgement from the following offices are included in Attachment ii) following this section: - <i>Ohio EPA</i> - <i>Bureau of Underground Storage Tank Regulations</i>
3. Community Involvement	Norwood is committed to providing its citizens and stakeholders ample opportunity to become informed about, and provide input into, all phases of the brownfields program. Public involvement will ensure that community concerns are considered in assessment planning and implementation, and the public is kept informed of project progress and results. The City proposes a continuous community outreach program that includes a minimum of six public and stakeholder meetings (held at City Hall, centrally located), regular update meetings with the Task Force (Section 2.a.iii), and ongoing project milestones and updates announced on the City's website. Announcements of grant award, document availability, and notice of public meetings will be published in the <u>Norwood Star</u> newspaper and <u>La Jordana Latina</u> a local Spanish-language newspaper, and by posting notices on community partners' websites. The City will also place advertisements on local radio stations (WJIF-88.3 FM, WMKV-89.3 FM, and WVXU-91.7 FM) and <u>La Mega</u> (WOXY-97.7 FM), the region's Spanish-language radio station, to reach underprivileged and less literate community residents and those without newspaper or internet service. While the vast majority of the City's residents speak English as their first language, approximately 5% of the population is Hispanic or Latino. As such, Norwood has budgeted for translation of materials and translator services for public meetings, and will make arrangements with the City Health Department to address any other need as identified. The City's community outreach program will continue through site use planning, site plan approval, and zoning review as site redevelopment progresses. The City will produce informational sheets corresponding with each Public Meeting to be posted online, and will host subsequent public meetings if additional information regarding specific brownfield projects is requested by citizens or stakeholders during project implementation.
4. Site & Ownership Eligibility	As Norwood is requesting Community Wide Assessment funds, this criterion does not apply.

## **ATTACHMENT II**

*Letters from State Environmental Authority*  
*Ohio EPA*  
*Bureau of Underground Storage Tank Regulations*



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Interim Director

January 16, 2014

U.S. Environmental Protection Agency, Region 5  
Brownfields and Early Action Section  
ATTN: Linda Mangrum and Kelley Moore  
77 West Jackson Blvd.  
Mail Code SM-7J  
Chicago, IL 60604-3507

**RE: City of Norwood Community-Wide Assessment Grant Proposal**

Dear Ms. Mangrum and Ms. Moore:

I am pleased to offer Ohio EPA's support for the City of Norwood Community-Wide Assessment Grant proposal. We have worked with the City of Norwood in the past and hope to be able to provide support to the City under the Assessment, Cleanup and Revolving Loan Fund Grant program established by the Small Business Liability Relief and Brownfield Revitalization Act (P.L. 107-118).

The funding the City of Norwood is requesting under their community-wide assessment grant proposal will be used for public outreach, community planning, and Phase I and Phase II Environmental Site Assessments. The funds will be focused on three target areas that are currently undergoing redevelopment or are currently underdeveloped and contain most of the City's brownfields. The City intends to use the requested grant funds to support existing redevelopment initiatives and further reinvest in polluted sites, create new jobs, increase the tax base, encourage economic redevelopment, and improve the health and safety in residential neighborhoods.

We look forward to working with the City of Norwood and U.S. EPA on this project. If you have any questions, please do not hesitate to contact me at 614-644-2285.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy Yersavich". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Amy Yersavich, Manager  
Ohio Environmental Protection Agency  
Site Assistance and Brownfield Revitalization

cc: Greg Orosz, Planning Contractor, City of Norwood  
Chris Brown, Assistant Law Director, City of Norwood  
Mike Starkey, Ohio EPA, DERR/SWDO





**Department  
of Commerce**

Division of State Fire Marshal  
John R. Kasich, Governor  
David Goodman, Director

January 13, 2014

**RECEIVED**

JAN 17 2014

**CITY OF NORWOOD  
LAW DIRECTORS OFFICE**

Ms. Linda Mangrum  
U.S. EPA Brownfield Contact, Region 5  
U.S. Environmental Protection Agency  
77 West Jackson Boulevard  
Mail Code SM-7J  
Chicago, IL 60604-3507

Subject: Letter of Support for the City of Norwood's U.S. EPA Brownfield Community Wide Assessment Grant Proposal

Dear Ms. Mangrum:

This letter acknowledges that the City of Norwood notified the Office of the Fire Marshal, Bureau of Underground Storage Tank Regulations (BUSTR) the City of Norwood's grant request to U.S. EPA for a \$400,000 grant to provide assessment for a community-wide brownfield assessment for petroleum and hazardous materials waste. The assessment grant monies will be focused on the three target areas: the Norwood Highway Lateral (S.R. 526), the Montgomery Road Corridor and Scattered Neighborhood Sites. Specifically, the grant will support existing redevelopment initiatives and further reinvest in polluted sites, create new jobs, increase tax base encourage economic redevelopment and improve the health and safety of residential neighborhoods.

The City is a 3.14 square mile urban community and with little to no undeveloped land. Historically, the City was a major industrial suburb of Cincinnati. With the closing of some major manufacturing plants, such as the General Motors assembly line, the City has declined in economic base as well as in population. The City of Norwood has been classified as a situational distressed community. The City's brownfields are some of the few remaining locations suitable for economic investment and are currently the most underutilized section of the city. Part of the grant process is to create an inventory of these potential brownfields sites and the City has identified approximately 80 former or current sites that have or had underground petroleum storage tanks. Of these identified sites, the City would focus on those that have been abandoned or those that have faced obstacles during the closure process.

The Assessment Grant will benefit the public by restoring control of contaminated sites through assessment cleanup and redevelopment. This will remove the threat and eliminates exposures, which are steps for protecting the general public and sensitive populations such as children and the elderly.

Page 2  
January 13, 2014  
U.S. EPA, Region 5

I am pleased to offer BUSTR's support for the City of Norwood Brownfield Assessment Grant proposal. We look forward to working with City of Norwood and the U.S.EPA on this project.

Sincerely,

A handwritten signature in cursive script, appearing to read "Verne A. Ord".

Verne A. Ord  
Assistant Chief – BUSTR  
Division of State Fire Marshal  
Ohio Department of Commerce

xc: Site File  
Greg Orosz, City of Norwood Planning Department

**ATTACHMENT III**

***Documentation of Applicant Eligibility  
(Not Applicable, City of Norwood is an Eligible Applicant)***

**ATTACHMENT IV**

***Letters of Support***

*Woven Oak Initiatives*

*Xavier University's Community Building Institute*

*Preventing Injuries in Norwood*

*Norwood Chamber of Commerce*

*Hispanic Chamber of Commerce*

*Norwood City Schools*

*Cincinnati Children's Hospital*



PO Box 12303  
Norwood OH 45212

January 12, 2014

To Whom It May Concern:

I am writing in support of the City of Norwood's application to the U.S. Environmental Protection Agency for funding to identify and mitigate brownfields located in the City.

Woven Oak Initiatives is an organization providing a home for local programs that seek to serve the common good through education and mentorship. We also serve as a community connector, providing opportunities for dialogue, service and relationship building. We identify, promote and work alongside existing neighborhood resources as well as incubating new initiatives. We do this out of a desire to see Norwood flourish.

We support the identification and mitigation of brownfields in Norwood because we recognize this will promote the common good of Norwood. Brownfield redevelopment will come alongside the efforts of the many service-oriented members of our community who have been great stewards of the homes, businesses, churches, schools and gathering places.

Because Norwood covers a relatively small area but is so centrally located, investment here creates an outsized impact. Many who come to live here become very active in groups that are working to improve the lives of all in the city, which means that every dollar that is awarded to the City will be more than matched by hardworking individuals, organizations and coalitions.

If the grant is awarded, Woven Oak will assist in its implementation by facilitating communication in the community about possible uses of redeveloped spaces. We will also help to educate and inform the community about the redevelopment work through our online presence and connections to local coalitions.

It is our hope that the U.S. Environmental Protection Agency will award this grant to the City and support ongoing efforts to promote the common good in Norwood.

Sincerely,

Angela Pancella

Executive Director



January 21, 2014

Gerry Stoker  
City of Norwood  
4645 Montgomery Rd  
Norwood, OH 45212

Dear Mr. Stoker:

I am writing in support of the City of Norwood application to the U.S. Environmental Protection Agency for environmental assessment funding.

CBI is a non-profit organization which uses asset-based community planning to promote development that is driven by the community rather than by outside agencies. This emphasizes the community's existing physical assets and the passion of its residents rather than simply constructing buildings and fixing problems. The Community Building Institute (CBI) works closely with communities and non-profit organizations surrounding Xavier University and throughout the Greater Cincinnati area. Promoting and funding brownfield assessment and redevelopment helps CBI to achieve its goal of assisting communities in harnessing existing assets to grow and improve quality-of-life.

If the grant is awarded, the Community Building Institute will assist documentation and communication of the process. Additionally, we can post information on our website, which is a useful tool for sharing development news with the Greater Cincinnati community.

We hope that the U.S. Environmental Protection Agency recognizes the positive impact brownfield assessment activities could have in our community and award a grant to the City of Norwood.

Sincerely,

A handwritten signature in black ink, appearing to read "Liz Blume", is written over a horizontal line.

Liz Blume  
Executive Director



PIN

**Preventing Injuries in Norwood**

(A community partnership working to reduce injuries to kids living in Norwood, Ohio)

January 8, 2014

Mayor Thomas F. Williams  
4645 Montgomery Road  
Cincinnati, Ohio 45212

As a member of PIN (Preventing Injuries in Norwood), I am pleased to offer my support of the City of Norwood application to the U.S. EPA Brownfields Assessment Grant (Community-Wide).

PIN's mission is to effectively provide injury prevention outreach to families and children of all ages living in Norwood, Ohio. Comprised of key community organizations and dedicated individuals which include: the Health Commissioner and nurses from Norwood Health Department, firefighters from the Norwood Fire Department, Director of Family and Student Service for Norwood City Schools and members of HIPPO, the YMCA, Norwood Service League, Norwood City Council and local churches. PIN utilizes the knowledge and expertise of its members to create inventive, effective and sustainable community-based interventions that aid in the reduction of unintentional injuries, often resulting in emergency room visits for Norwood children.

In recognizing that environmental hazards are a major concern for the health and safety of young children, PIN works to support community collaboration that creates safer environments for children to live and play.

If the award is granted, PIN will assist with community outreach supporting the City of Norwood's effort to protect human health and promote effective partnerships within its community.

We hope The U.S. Environmental Protection Agency will consider all the innovative community and life-enhancing benefits the Brownfields Assessment support will provide to City of Norwood and its community members.

Sincerely,



Dawne Gardner  
Norwood PIN Team member

MLC 3019, 3333 Burnet Ave  
Cincinnati, Ohio 45229-3026  
phone: (513) 636-3153  
fax: (513) 636-3827  
dawne.gardner@cchmc.org





P.O. Box 12144 ♦ Norwood, Ohio 45212  
Voice mail 513.956.7935 ♦ Fax 513.741.8778  
[www.norwoodchamberofcommerce.org](http://www.norwoodchamberofcommerce.org)

January 20, 2014

Gerry Stoker  
City of Norwood  
4645 Montgomery Road  
Norwood, OH 45212

Dear Gerry:

On behalf of the Norwood Chamber of Commerce, I am writing to support the application for a U.S. Environmental Protection Agency for environmental assessment funding for the City of Norwood. The grant will provide funds to identify and mitigate brownfields located in Norwood. These properties are former industrial or commercial businesses which have possible environmental contaminants.

For this reason, we are pleased to provide this letter of support and hopeful that this grant will be awarded to the City of Norwood. If the grant is awarded, the Norwood Chamber of Commerce will assist in the implementation of the grant by convening community members and business representatives to discuss possible future uses for properties that are assessed in our neighborhood. Additionally, we can post information on-line and through our newsletter on the progress and results of any assessments activities that are conducted.

We hope that the U.S. Environmental Protection Agency recognizes the positive impact brownfield assessment activities could have on our community and award a grant to the City of Norwood.

Yours truly,

A handwritten signature in cursive script that reads 'Kathy Walters'.

Kathy Walters, Executive Director  
Norwood Chamber of Commerce



January 21, 2013

Gerry Stoker  
City of Norwood  
4645 Montgomery Rd  
Norwood, OH 45212

Dear Mr. Stoker:

I am writing in support of the City of Norwood application to the U.S. Environmental Protection Agency for environmental assessment funding.

The Hispanic Chamber is a non-profit organization whose mission is to promote the continued growth and development of the Hispanic/Latino business community in the Tri-State area. The Chamber works closely with profit and nonprofit area businesses as well as the local and state Chambers of Commerce and the U.S. Hispanic Chamber of Commerce. This Chamber is a link and forum within the national network of Hispanics business associations and firms, working to expand business opportunities; to encourage mutually beneficial ties with the public and private sectors; to serve as an active and visible advocate in the Hispanic business arena; and to actively promote trade business community and our Latin American counterparts. Promoting and funding brownfield assessment and redevelopment will help the Chamber to achieve its goals.

If the grant is awarded, The Hispanic Chamber will assist in the implementation of the grant by arranging for community members and business representatives to discuss possible future uses for properties that are assessed in our neighborhood. Additionally, we can post information on the Chamber's website, which is an ultimate tool that provides excellent opportunities to share information with the Hispanic community and beyond.

We hope that the U.S. Environmental Protection Agency recognizes the positive impact brownfield assessment activities could have in our community and award a grant to the City of Norwood.

Sincerely,

Alfonso Cornejo  
President

Mayor Thomas F. Williams  
4645 Montgomery Road  
Cincinnati, Ohio 45212

January 7, 2014

As Superintendent of the Norwood City Schools, I am writing to express my support for the City of Norwood's application for a U.S. EPA Brownfields Assessment Grant (Community-Wide).

Norwood City Schools serves approximately 2,200 students in pre-school through 12<sup>th</sup> grade. We are a district in which over 70% of our students receive free and reduced lunch. Even with excellent instruction and involved families, we know that academic success can be thwarted by environmental hazards. Healthy children come better prepared to learn than children whose environments put them at risk for injury or illness.

Though Norwood's local industry is moving toward retail and business, it is an older community with a long history of manufacturing. Residential areas and businesses are often adjacent to one another. The children of our school district reside near and travel past areas that are potential hazardous on their way to school.

If awarded the grant school district representatives will work cooperatively with the City of Norwood to identify and assess areas that specifically impact the children we serve and educate. We hope the US Environmental Protection Agency recognizes the positive impact brownfield assessment activities could have on our community and awards the grant to the City of Norwood.

Sincerely,

A handwritten signature in black ink, appearing to read 'Robert Amodio', with a long horizontal flourish extending to the right.

Robert Amodio

Superintendent, Norwood City Schools



Level I  
Regional Center  
for Pediatric Trauma

Richard A. Falcone Jr., MD, MPH  
*Director  
Trauma Services*

Rebecca L. Brown, MD  
*Associate Director  
Trauma Services*

Victor F. Garcia, MD  
*Founding Director  
Trauma Services*

Lynn J. Haas, MSN, CNP  
*Program Manager  
Trauma Services*

Patrick W. Edmunds, MPA  
*Program Manager  
Comprehensive Children's Injury Center*

Mayor Thomas F. Williams  
4645 Montgomery Road  
Cincinnati, OH 45212

January 8, 2014

Mayor Williams,

As the Director of Trauma Services at Cincinnati Children's I would like to offer my full support to you application for the City's Brownfield cleanup efforts from the US EPA. I have valued the partnership we have had in reducing pediatric injuries in Norwood as part of the Preventing Injuries in Norwood (PIN) group and believe that ensuring there are safe areas for children to play and grow only further supports these efforts.

Through our work with the committed citizens and government agencies of Norwood I have been extremely impressed with the drive to continually make your city a safer and healthier place to live. Please let me know if there is anything further I can do to support not only the efforts for this grant but other efforts in the future.

Sincerely,

Richard A. Falcone, Jr, MD, MPH  
Director, Trauma Services  
Associate Professor of Surgery

**ATTACHMENT V**

***Documentation of Leveraged Funds  
(Not Applicable)***

**ATTACHMENT VI**

***Justification for Requested Waiver of Funding Limit  
(Not Applicable)***

**ATTACHMENT VII**

**Property-Specific Determination Request**  
*(Not Applicable)*



## **ATTACHMENT VIII**

### **Letters of Commitment from Assessment Coalition Members (*Not Applicable*)**

**ATTACHMENT IX**

***Petroleum Eligibility Determination  
(Not Applicable)***

**ATTACHMENT X**

***Special Considerations Checklist***

### Appendix 3 Other Factors Checklist

Name of Applicant: City of Norwood, Ohio

Please identify (with an **X**) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

	Other Factor	Page #
	Community population is 10,000 or less	
	Federally recognized Indian tribe	
	United States territory	
	Applicant will assist a Tribe or territory	
	Targeted brownfield sites are impacted by mine-scarred land	
	Targeted brownfield sites are contaminated with controlled substances	
	Recent natural disaster(s) (2006 or later) occurred within community, causing significant community economic and environmental distress	
x	Project is primarily focusing on Phase II assessments.	p.8
	Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation	
x	Community experienced manufacturing plant closure(s) (2008 or later) tied to the targeted brownfield sites or project area, including communities experiencing auto plant closures due to bankruptcy or economic disruptions.	p.4
x	Recent (2008 or later) significant economic disruption ( <u>unrelated</u> to a natural disaster or manufacturing/auto plant closure) has occurred within community, resulting in a significant percentage loss of community jobs and tax base.	p.4
	Applicant is a recipient or a core partner of a HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant that is directly tied to the project area, and can demonstrate that funding from a PSC grant has or will benefit the project area. To be considered, <u>applicant must attach documentation</u> which demonstrates this connection to a HUD-DOT-EPA PSC grant.	
	Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant	
x	Community is implementing green remediation plans.	p.13
	Climate Change (also add to "V.D Other Factors")	